

May 20, 2011

***Via Electronic Filing***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, RM-11510

Dear Ms. Dortch:

On May 19, 2011, Christopher Guttman McCabe and Brian Josef, of CTIA – The Wireless Association® (“CTIA”), met with Ruth Milkman, Roger Noel, Michael McKenzie, Lloyd Coward, Jennifer Flynn, and Nina Shafran, all of the FCC’s Wireless Telecommunications Bureau.

During the meeting, the parties discussed CTIA’s Petition for Rulemaking to transition Part 22 cellular licenses from site-based to geographic market-area licensing. The parties discussed specific proposals to utilize market-based licensing, including how to define “substantially licensed” areas that trigger a transition, what exclusions may be needed, and the impact of mutually exclusive license applications coupled with the application of the FCC’s anti-collusion rules. CTIA expressed its strong interest in the Commission moving forward with a Notice of Proposed Rulemaking to advance the goals of CTIA’s Petition.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef  
Assistant Vice President, Regulatory Affairs

cc: Ruth Milkman  
Roger Noel  
Michael McKenzie  
Lloyd Coward  
Jennifer Flynn  
Nina Shafran